

ESTTA Tracking number: **ESTTA670419**

Filing date: **05/04/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Renaissance Hotel Holdings, Inc.
Granted to Date of previous extension	05/03/2015
Address	10400 Fernwood Road Bethesda, MD 20817 UNITED STATES
Attorney information	Paul F Kilmer Holland & Knight LLP 800 17th Street, NW Suite 1100 Washington, DC 20006 UNITED STATES paul.kilmer@hklaw.com Phone:202 955 3000

Applicant Information

Application No	86293435	Publication date	11/04/2014
Opposition Filing Date	05/04/2015	Opposition Period Ends	05/03/2015
Applicant	Circus and Eldorado Joint Venture 407 N. Virginia Street Reno, NV 89501 UNITED STATES		

Goods/Services Affected by Opposition

Class 041. First Use: 2014/05/28 First Use In Commerce: 2014/05/28
All goods and services in the class are opposed, namely: Entertainment services, namely, casino gaming; Entertainment, namely, live music concerts; Entertainment, namely, live performances by a musical band; Entertainment, namely, live performances by musical bands

Applicant Information

Application No	86293454	Publication date	11/04/2014
Opposition Filing Date	05/04/2015	Opposition Period Ends	
Applicant	Circus and Eldorado Joint Venture 407 N. Virginia Street Reno, NV 89501 UNITED STATES		

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Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)
Other	Deficient specimens of use; Applicant does not provide the services claimed in the applications

Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	1310478	Application Date	11/22/1982
Registration Date	12/18/1984	Foreign Priority Date	NONE
Word Mark	RENAISSANCE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 043. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 Hotel and Cocktail Lounge Services		

U.S. Registration No.	1714479	Application Date	09/20/1991
Registration Date	09/08/1992	Foreign Priority Date	NONE
Word Mark	RENAISSANCE CLUB		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 043. First use: First Use: 1982/09/00 First Use In Commerce: 1982/09/00 hotel and restaurant services		


U.S. Registration No.	1870198	Application Date	02/14/1994
Registration Date	12/27/1994	Foreign Priority Date	NONE
Word Mark	RENAISSANCE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 042. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 restaurant and night club services		

U.S. Registration No.	1989665	Application Date	02/14/1995
Registration Date	07/30/1996	Foreign Priority Date	NONE
Word Mark	RENAISSANCE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 039. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 arranging travel tours; travel booking agencies; travel guide services; travel information services


U.S. Registration No.	2098636	Application Date	09/25/1995
Registration Date	09/23/1997	Foreign Priority Date	NONE
Word Mark	RENAISSANCE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 providing facilities for business meetings; providing convention facilities; operation of businesses for others, namely, operation of hotels, resorts, restaurants, night clubs; secretarial and word processing services; photocopying services; franchising, namely offering technical assistance in the establishment and/or operation of hotels, resorts, restaurants, night clubs</p> <p>Class 037. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 real estate development; real estate site selection</p> <p>Class 038. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 facsimile and data transmission services</p> <p>Class 039. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 ground transportation services, namely, bicycle rental, [motorcycle rental,] car rental, and ground transportation of passengers by car, limousine, van or bus</p> <p>Class 041. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 golf club services; health club services; rental of skin diving equipment [; casino services]</p> <p>Class 042. First use: First Use: 1981/03/22 First Use In Commerce: 1981/03/22 providing general purpose facilities for exhibitions; health resorts; health spas; banquet and social function facilities for special occasions; hotel concierge services; making hotel reservations for others; hotel services for preferred customers; resort hotels; night clubs; rental of rooms; travel agency services, namely, making reservations and booking for temporary lodging</p>		


U.S. Registration No.	3002828	Application Date	01/30/2004
Registration Date	09/27/2005	Foreign Priority Date	NONE
Word Mark	UNIQUELY RENAISSANCE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 043. First use: First Use: 2004/02/02 First Use In Commerce: 2004/02/02 hotel services; restaurant, catering, bar and lounge services; resort and lodging services; provision of general purpose facilities for meetings, conferences and exhibitions; provision of banquet and social function facilities for special occasions; and reservation services for hotel accommodations for others

U.S. Registration No.	3075544	Application Date	10/27/2003
Registration Date	04/04/2006	Foreign Priority Date	NONE
Word Mark	RENAISSANCE HOTELS		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 041. First use: First Use: 2003/06/01 First Use In Commerce: 2003/06/01 Health club services, namely providing instruction and consultation in the field of physical exercise; providing use of exercise equipment; providing fitness and exercise facilities; golf club, golf course and golf instruction services</p> <p>Class 043. First use: First Use: 2003/06/01 First Use In Commerce: 2003/06/01 Hotel services; restaurant, catering, bar and lounge services; resort and lodging services; provision of general purpose facilities for meetings, conferences and exhibitions; provision of banquet and social function facilities for special occasions; and reservation services for hotel accommodations</p> <p>Class 044. First use: First Use: 2003/06/01 First Use In Commerce: 2003/06/01 Health spa services, namely, providing facial, hair, skin and body treatments, manicure and pedicure services, massage services, body waxing services and beauty salon services</p>		

U.S. Registration No.	3874452	Application Date	07/14/2009
Registration Date	11/09/2010	Foreign Priority	NONE

		Date	
Word Mark	R RENAISSANCE		
Design Mark			
Description of Mark	The mark consists of a stylized "R" above the word "Renaissance".		
Goods/Services	Class 043. First use: First Use: 2009/09/17 First Use In Commerce: 2009/09/17 Hotel services, restaurant, catering, bar and cocktail lounge services; resort lodging services; provision of general purpose facilities for meetings, conferences and exhibitions; provision of banquet and social function facilities for special occasions; and reservation servicesfor hotel accommodations for others		

U.S. Registration No.	4225863	Application Date	12/21/2007
Registration Date	10/16/2012	Foreign Priority Date	NONE
Word Mark	RENAISSANCE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2005/12/00 First Use In Commerce: 2005/12/00 Shirts; Hats; Caps		

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		

Word Mark	RENAISSANCE
Goods/Services	Entertainment services

Attachments	78360051#TMSN.png(bytes) 78318798#TMSN.png(bytes) 77780851#TMSN.png(bytes) 77357657#TMSN.png(bytes) RENOSSANCE Notice of Opp Circus.pdf(279070 bytes) RENOSSANCE MAN Notice of Opp Circus.pdf(279733 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Paul Kilmer/
Name	Paul F Kilmer
Date	05/04/2015

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

RENAISSANCE HOTEL HOLDINGS, INC.)	
)	
Opposer)	
)	
v.)	Opp. No. _____
)	
)	(Serial No. 86293435)
Circus and Eldorado,)	
a Joint Venture,)	
doing business)	
as Silver Legacy)	
Circus and Eldorado)	
)	
____ Applicant)	

NOTICE OF OPPOSITION

Renaissance Hotel Holdings, Inc. ("Opposer"), a corporation organized and existing under the laws of the State of Delaware, with its principal place of business located at 10400 Fernwood Road, Bethesda, MD 20817, believes that it will be damaged by the registration of the mark RENOSSANCE ("Applicant's Mark") claimed in Application Serial No. 86293435 (the "Application") of Circus and Eldorado, a Joint Venture under the laws of the State of Nevada, doing business as Silver Legacy Circus and Eldorado at 407 N. Virginia Street, Reno, Nevada 89501 ("Applicant"), and hereby opposes registration of same under the provisions of Section 13 of the Trademark Act of 1946, 15 U.S.C. §1063.

As grounds for opposition, Opposer alleges the following:

1. Opposer is the owner of all right, title, and interest in and to the well-known and famous trademark and service mark RENAISSANCE, which Opposer and its predecessors in interest (collectively hereinafter "Opposer") have used since at least as early as 1981 in connection with hotel and restaurant services, as well as other goods and services, including entertainment services.

2. In connection with its goods and services, Opposer has used a family of trademarks that prominently feature the designation RENAISSANCE, both alone and in combination with other word and design elements (collectively, the "RENAISSANCE Marks"), including the marks RENAISSANCE, RENAISSANCE CLUB, UNIQUELY RENAISSANCE, RENAISSANCE HOTELS, R RENAISSANCE, and others.

3. Opposer is the owner of the following U.S. trademark and service mark registrations, which are valid and subsisting:

<u>Reg. No.</u>	<u>Mark</u>	<u>Registration Date</u>
1,310,478	RENAISSANCE	December 18, 1984.
1,714,479	RENAISSANCE CLUB	September 8, 1992.
1,870,198	RENAISSANCE	December 27, 1994.
1,989,665	RENAISSANCE	July 3, 1996.
2,098,636	RENAISSANCE	September 23, 1997.
3,002,828	UNIQUELY RENAISSANCE	September 27, 2005.
3,075,544	RENAISSANCE HOTELS	April 4, 2006.
3,874,452	R RENAISSANCE (stylized)	November 9, 2010.

4. Opposer's registrations listed above provide evidence of Opposer's ownership of its RENAISSANCE marks, of the validity of those marks, and of Opposer's exclusive right to use those marks in commerce in connection with the goods and services identified in the registrations.

5. Opposer's RENAISSANCE Marks have been continuously and extensively used, advertised and promoted in interstate commerce at common law in connection with Class 41 services since long prior to the filing date of the Application.

6. As a result of Opposer's widespread use, advertising, and promotion of its RENAISSANCE Marks in connection with Class 41 services and related services, such marks have become well-known and famous as distinctive indicators of the origin of Opposer's services, including its entertainment services, and Opposer's RENAISSANCE Marks have acquired a highly favorable reputation among relevant members of the purchasing public and have become valuable symbols of Opposer's goodwill.

7. Notwithstanding Opposer's prior rights in the RENAISSANCE Marks, Applicant filed the Application in the United States Patent and Trademark Office for registration of the Applicant's Mark for "Entertainment services, namely, casino gaming; Entertainment, namely, live music concerts; Entertainment, namely, live performances by a musical band; Entertainment, namely, live performances by musical bands" in International Class 41 (collectively "Applicant's Services").

8. On information and belief, Applicant knew or had reason to know of Opposer's prior rights in the RENAISSANCE Marks when Applicant filed the Application, including Opposer's rights in relation to use of the RENAISSANCE Marks for entertainment services.

9. Opposer's RENAISSANCE Marks are famous and became famous long prior to the date of first use alleged in the Application.

COUNT I

Likelihood of Confusion - §2(d)

10. Opposer realleges and incorporates by reference the allegations contained in paragraphs 1 through 9, above, as if set forth in their entirety herein.

11. Applicant's Mark (RENOSSANCE) so closely resembles the Opposer's RENAISSANCE Marks in appearance, sound and meaning that the use and registration thereof by Applicant are likely to cause confusion, mistake, and deception as to the source or origin of Applicant's Services and will injure and damage Opposer and the goodwill and reputation symbolized by Opposer's RENAISSANCE Marks.

12. Applicant's Services, if offered under or by reference to Applicant's Mark, are so closely related to services provided by Opposer under and by reference to the RENAISSANCE Marks, including especially Opposer's Class 41 services, that relevant consumers and others are likely to be confused, to be deceived, and to assume erroneously that Applicant's Services are those of Opposer or that Applicant

is in some way connected with, sponsored by or affiliated with Opposer, all to Opposer's irreparable damage and injury.

13. Likelihood of confusion in this case is enhanced by the fame of Opposer's RENAISSANCE Marks and by the fact that the Applicant's Services are competitive with or closely related to certain of the services provided by Opposer under its RENAISSANCE Marks.

14. Likelihood of confusion, mistake and deception is enhanced by the fact that certain of Opposer's services offered under and by reference to the RENAISSANCE Marks are offered, provided or intended to be provided to the same classes of prospective customers as are Applicant's Services claimed in the Application.

15. Under the circumstances, registration of the Applicant's Mark is likely to cause Opposer to lose control over the good and valuable reputation represented by and derived from the RENAISSANCE Marks.

16. Registration of the Applicant's Mark in light of the prior rights of Opposer in the RENAISSANCE Marks is therefore likely to cause confusion, mistake and/or deception among members of the relevant purchasing public, resulting in damage and injury to Opposer in violation of the provisions of Section 2(d) of the Trademark Act. 15 U.S.C. §1052(d).

COUNT II

Dilution - §43(c)

17. Opposer realleges and incorporates by reference the allegations contained in paragraphs 1 through 16, above, as if set forth in their entirety herein.

18. Use or registration of the Applicant's Mark will cause dilution of the distinctive quality of the Opposer's famous RENAISSANCE Marks.

19. Use or registration of the Applicant's Mark will lessen the capacity of Opposer's famous RENAISSANCE Marks to identify and distinguish Opposer's goods and services.

20. Use or registration of the Applicant's Mark will deprive Opposer of the ability to protect its reputation, persona, and goodwill, and will tarnish the good and valuable reputation of Opposer and its famous RENAISSANCE Marks.

21. Likelihood of damage to Opposer's goodwill is enhanced by the fact that prospective customers who encounter defects in the quality of Applicant's Services will attribute those defects to Opposer, and this will dilute by blurring and tarnishment Opposer's reputation and goodwill.

22. By reason of the foregoing, Opposer will be damaged by the registration of the Applicant's Mark and registration should be refused pursuant to the provisions of Section 43(c) of the Trademark Act. 15 U.S.C. §1125(c).

COUNT III

Deficient Specimen of Use

23. Opposer realleges and incorporates by reference the allegations contained in paragraphs 1 through 22, above, as if set forth in their entirety herein.

24. On information and belief, the specimen provided by Applicant at the time it filed the Application was facially deficient and did not demonstrate use of Applicant's Mark in relation to the services claimed in the Application. Registration of Applicant's mark should be denied as a result.

COUNT IV

Applicant Does Not Provide the Claimed Services

25. Opposer realleges and incorporates by reference the allegations contained in paragraphs 1 through 24, above, as if set forth in their entirety herein.

26. On information and belief, and based upon a review of Applicant's online promotional and advertising material, Applicant does not and, at all times relevant to this proceeding, has not provided the services claimed in the Application, and registration should be denied as a result.

The required fee has been provided.

WHEREFORE, Opposer prays that this opposition be sustained and that registration be denied to the Application.

RENAISSANCE HOTEL HOLDINGS, INC.

Date: May 4, 2015

By: 

Paul F. Kilmer
HOLLAND & KNIGHT LLP
800 17th Street, N.W., Suite 1100
Washington, D.C. 20006
(202) 663-7269
Attorneys for Opposer

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing NOTICE OF OPPOSITION was sent by first class mail, postage pre-paid on this 4th day of May, 2015, to the following:

Lucas Foletta, Esq.
MCDONALD CARANO WILSON LLP
100 West Liberty Street, 10th Floor
Reno, Nevada 89505

Laurie C. Milton

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BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

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v.)	Opp. No. _____
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)	(Serial No. 86293454)
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doing business)	
as Silver Legacy)	
Circus and Eldorado)	
)	
Applicant)	

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21. Likelihood of damage to Opposer's goodwill is enhanced by the fact that prospective customers who encounter defects in the quality of Applicant's Services will attribute those defects to Opposer, and this will dilute by blurring and tarnishment Opposer's reputation and goodwill.

22. By reason of the foregoing, Opposer will be damaged by the registration of the Applicant's Mark and registration should be refused pursuant to the provisions of Section 43(c) of the Trademark Act. 15 U.S.C. §1125(c).

COUNT III

Deficient Specimen of Use

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RENAISSANCE HOTEL HOLDINGS, INC.

Date: May 4, 2015

By: 

Paul F. Kilmer
HOLLAND & KNIGHT LLP
800 17th Street, N.W., Suite 1100
Washington, D.C. 20006
(202) 663-7269
Attorneys for Opposer

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing NOTICE OF OPPOSITION was sent by first class mail, postage pre-paid on this 4th day of May, 2015, to the following:

Lucas Foletta, Esq.
MCDONALD CARANO WILSON LLP
100 West Liberty Street, 10th Floor
Reno, Nevada 89505

Laurie C. Milton